

Detroit Food Commons
AKT Peerless
November 5, 2021

| Response Activity or Continuing Obligation | Required Activities | Party Responsible for Completing Activity | Timing of Activity | Required Follow-up or Reporting |
|---|---|--|------------------------------|--|
| Pre-Demolition and building hazardous materials survey | A pre-demolition asbestos and other hazardous materials survey has been prepared for the remaining structure located on the property (a dwelling at 100 E. Euclid Street); asbestos and other hazardous materials abatement is necessary prior to demolition of the structure. | Developer, contractor | Pre-construction | Air monitoring and abatement reports; disposal records |
| Baseline Environmental Assessment (BEA) | A BEA will be prepared on behalf of the Detroit Black Community Food Security Network, Develop Detroit, Inc., and related entities, as applicable, within 45 days of acquisition of the properties owned by the City of Detroit. | Consultant, developer | Pre-construction | BEA report; letter of acknowledgement from EGLE |
| ECMP – Soil Removal | The fill material encountered at the subject property contains concentrations of mercury that may represent a vapor intrusion concern. Therefore, in accordance with the Act 381 Work Plan, the fill material on the subject property parcel with a proposed building will be excavated to native clay. | Contractor, consultant, developer | During construction | Analytical results |
| ECMP – Soil Verification Sampling | Soil verification sampling will be conducted subsequent to the excavation of fill material for laboratory analysis of mercury. | Consultant, developer | During construction | Analytical results |
| ECMP – Clean Fill | The fill material brought to the site will be documented as clean by analytical results from samples collected from the site of origin documenting that the material does not contain metals at concentrations above the applicable non-residential cleanup criteria. | Contractor | During construction | Analytical results |
| ECMP – Soil Vapor Sampling | If mercury remains at concentrations that may represent a vapor intrusion concern, soil gas monitoring will be conducted to confirm there is no vapor intrusion concern. | Consultant, developer | During and post-construction | Analytical results |

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| Section 106 – Unanticipated Discoveries Plan | Once construction has started, the Unanticipated Discoveries Plan shall be followed for the duration of the project. | Construction Crew, Foremen, Developer | During Construction | Unanticipated Discoveries Plan |
| Documentation of Due Care Compliance (DDCC) | In accordance with Section 20107a of the Natural Resources and Environmental Protection Act (NREPA), a complete a DDCC report and submit to the City of Detroit Environmental Review Officer for review prior to submitting to EGLE. If necessary and installed, engineering controls will require an Operations and Maintenance plan. | Consultant, developer | Post-construction | DDCC with appropriate analytical results, inspection reports with photographs, and EGLE approval |